

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; LISA PARISI; and
SHANNA ORLICH, on behalf of themselves and all
others similarly situated,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE GOLDMAN
SACHS GROUP, INC.,

Defendants.

No. 10 Civ. 6950 (LBS) (JCF)
DECLARATION OF ANNE
B. SHAVER IN SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL DISCOVERY OF
DATA AND DOCUMENTS

I, ANNE B. SHAVER, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an associate at Lieff, Cabraser, Heimann & Bernstein, LLP, counsel for Plaintiffs and the putative class in the above-referenced action, and an attorney in good standing admitted *pro hac vice* to this Court.

2. I make this Declaration based on personal knowledge in support of Plaintiffs' Motion to Compel Discovery of Data and Documents.

3. Attached are true and correct copies of the following documents:

a) Attached as Exhibit A is a copy of a letter from Theodore O. Rogers, counsel for Defendants, to Magistrate Judge Francis, dated June 13, 2011.

b) Attached as Exhibit B is a copy of a letter from Adam T. Klein, counsel for Plaintiffs, to Magistrate Judge Francis, dated June 21, 2011.

c) Attached as Exhibit C is a copy of a letter from Adam T. Klein, counsel for Plaintiffs, to Magistrate Judge Francis, dated February 15, 2012.

d) Attached as Exhibit D is a copy of a letter from Barbara B. Brown, counsel for Defendants, to Magistrate Judge Francis, dated February 29, 2012.

e) Attached as Exhibit E is a copy of a letter from Adam T. Klein, counsel for Plaintiffs, to Magistrate Judge Francis, dated March 7, 2012.

f) Attached as Exhibit F is a copy of a letter from Barbara B. Brown, counsel for Defendants, to Magistrate Judge Francis, dated April 3, 2012, attaching Exhibit A (Affidavit of Cathy Obradovich) and Exhibit B (Affidavit of Ankur Pathak).

g) Attached as Exhibit G is a copy of transcript excerpts from the deposition of Cathy Obradovich, taken on April 18, 2012.

h) Attached as Exhibit H is a copy of transcript excerpts from the deposition of Ankur Pathak, taken on April 19, 2012.

4. I declare under penalty of perjury under the laws of New York and the United States that the foregoing is true and correct.

Dated: New York, New York
May 2, 2012

By: /s/ Anne B. Shaver
Anne B. Shaver

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